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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

AUG - 1 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 ) CC Docket No. 92-77  
Billed Party Preference )  
for 0+ InterLATA Calls )

COMMENTS

MCI Telecommunications Corporation (MCI) hereby comments on the Commission's Further Notice of Proposed Rulemaking (FNPRM) in the above-captioned proceeding concerning the adoption of billed party preference (BPP). In the FNPRM, the Commission tentatively concludes, based upon a voluminous record, that the benefits of BPP outweigh its costs and, therefore, the implementation of BPP would serve the public interest. The Commission invites interested parties to comment on its position and the underlying cost/benefit analysis. As discussed herein, MCI supports the Commission's determinations and, therefore, the prompt implementation of BPP in the public network.

BPP Represents Enormous Consumer Benefits

In the FNPRM, the Commission focuses essentially on three benefits of BPP in its cost/benefit analysis. First, BPP would guarantee that operator service calls are handled by the billed party's preferred carrier without the need to rely on service access codes. Second, BPP would better promote competition in the operator services market because competitors of AT&T, the dominant carrier, would be able to offer and use the same 0+ access as AT&T. And, third, BPP would require operator service

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providers to refocus their competitive efforts on end users rather than on commission payments being made to premise owners.

These benefits -- and their importance in the public interest -- cannot be overstated. BPP would finally bring the benefits of equal access for operator service calls to consumers because they would be able to choose a carrier for service delivery. With BPP, all consumers would be able to enjoy the ease of 0+ dialing, and they would no longer have to contend with lengthy access codes. Consumers' attempts to reach their carrier-of-choice would no longer be blockable at aggregator locations; and, importantly, consumers would no longer be surprised by exorbitant charges for operator service calls.

In addition, BPP would finally make possible effective competition in the operator services market segment. Currently, AT&T enjoys an unwarranted advantage in the operator services market because of the remaining vestiges of its monopoly. The District Court recognized this during divestiture,<sup>1</sup> but BPP was not available at that time as a means to bring competition to the operator services market. Therefore, the Court ordered, as an interim measure, that payphones be presubscribed by the premise owner. The presubscription process, however, did not bring real competition to the operator services market. On the contrary, it created perverse incentives whereby operator service providers "compete" to be the presubscribed carrier through making huge

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<sup>1</sup> See, United States v. Western Electric Co., 698 F.Supp. 348, 361 (D.D.C. 1988).

commission payments made to premise owners -- rather than competing for consumer business through better services and lower rates. Now, a decade after divestiture, it is time to end this temporary measure and finally achieve real competition in the operator services market by implementing BPP.

The benefits of BPP cannot be achieved by any other means, including the implementation of the Telephone Operator Consumer Services Improvement Act (TOCSIA). As an initial matter, full compliance with the Commission's rules implementing TOCSIA, which require aggregators to unblock 800, 950 and 10XXX access, has not been achieved.<sup>2</sup> Moreover, there is no effective way to ensure full compliance.<sup>3</sup>

In any event, TOCSIA is no substitute for BPP because it does not achieve full equal access. MCI's experience and research indicate that consumers want the convenience of being able to access their preferred carrier with 0+ dialing.<sup>4</sup> According to consumers, access code dialing takes too long and involves too many digits and, therefore, cards that require such

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<sup>2</sup> For example, as recently as May of this year, the Eastern Telecom Corp. agreed to pay fines in an out-of-court settlement with the Virginia State Corporation Commission for blocking calls to other long-distance carriers from its payphones.

<sup>3</sup> Currently, compliance is monitored by making test calls from aggregator locations. The sheer number of aggregator locations, however, makes this method of ensuring compliance ineffective.

<sup>4</sup> In many cases, consumers are willing to forego the advanced features and lower prices of service via calling cards that require access numbers in favor of 0+ dialing.

dialing patterns are inconvenient to use.<sup>5</sup> Thus, without universally available 0+ access to the carrier of his or her choice, a consumer is unreasonably hindered in the use of the public network.

#### BPP Costs Do Not Outweigh Benefits

The costs of BPP, although significant, do not outweigh the enormous benefits explained above. As an initial matter, the cost estimates filed by the local exchange carriers (LECs) are exaggerated. In addition, as demonstrated in the FNPRM,<sup>6</sup> a number of cost "offsets" will result from BPP deployment, such that the rates for operator service calls should not change significantly, if at all.

Moreover, with an appropriate cost recovery mechanism, these costs can be absorbed without the imposition of an undue burden on any party. In this regard, MCI urges that the Commission adopt a cost recovery mechanism for the investments and software necessary to support BPP from a broad-based charge on all carriers using switched access. Such a charging mechanism is appropriate because BPP will provide equal access to the 0+

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<sup>5</sup> In addition, such cards are risky to use in public places where the access codes are subject to thievery.

<sup>6</sup> The Commission states that many of the costs cited by the LECs "would be due to a shifting of functionalities from the OSP networks to the LEC networks. Therefore, most of these costs would be offset by cost savings to OSPs." FNPRM at ¶ 25. In addition, the Commission states that BPP would produce cost savings by reducing commission payments, regulatory costs and the OSPs' costs of collections and uncollectables. See, FNPRM at ¶ 12, 16 and 17.

marketplace and, therefore, the investments and software necessary to support it represent continuation of the structural changes to the telecommunications industry that began with 1+ presubscription and equal access. In addition, the provision of equal access in the 0+ marketplace is a broad-based change in the industry structure, which will benefit all end users. Consequently, all carriers should be required to contribute toward satisfying the set-up costs for BPP.

These set-up or non-recurring costs should be amortized over a period of several years similar to the program set up to recover equal access costs that is in place today. Once the costs are fully recovered, the charges should cease.<sup>7</sup>

Remaining recurring costs, such as the ongoing costs of routing BPP calls, could be recovered on a per-message charge basis. Many of the costs associated with BPP, however, are of a type which are already recovered in existing charges under Part 69.<sup>8</sup> Therefore, before the Commission prescribes any specific charge to cover these costs, e.g., a per-message charge on 0+ calls, it should re-examine the cost assignments under Part 69 to

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<sup>7</sup> The price cap LECs currently have embedded in their rates the amortized costs of providing 1+ equal access. Since the Commission has not required removal of these expenses through an exogenous adjustment, the LECs may already have sufficient funds embedded in their rates to recover the costs of BPP, which is merely 0+ equal access. Thus, any exogenous treatment of BPP set-up costs must be offset by the equal access costs already reflected in price cap LEC rates.

<sup>8</sup> For example, operator expenses are already reflected in the Information element, and LIDB-related expenses associated with storing the information concerning the end user's 0+ primary interexchange carrier would be assigned to the LIDB element.

ensure that only those incremental costs which result from BPP are recovered in that specific charge.<sup>9</sup>

### BPP Implementation Issues

MCI agrees with the Commission's tentative conclusion that BPP should apply to all interLATA 0+ and 0- calls and that it should be available in independent LEC territories.<sup>10</sup> This comprehensive coverage will allow consumers to select one interLATA carrier for all calls billed to their phone line, both 1+ and 0+, if they choose, or they can select a carrier for their 1+ calls and a different carrier for their 0+ calls. Access lines in both equal access and non-equal access areas should be subject to BPP. Moreover, to ensure that the billed party's carrier handles the call, payphone providers and aggregators should be prohibited from using blocking or other mechanisms to circumvent the billed party's carrier of choice.

With the implementation of BPP, provision also must be made for the recognition and routing of proprietary interexchange carrier cards, such as those conforming to the 891 and CIID

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<sup>9</sup> Such a re-examination should occur in the context of a Part 69 Access Reform proceeding. See, e.g., Ad Hoc Telecommunications Users Committee Petition for Rulemaking; Amendment of Part 36 and Part 69 of the Commission's Rules to Effect Comprehensive Reform of the Access Charge System, filed April 15, 1994; and Amendments of the Rules to Reform Interstate Access Charges: USTA Petition for Rulemaking, Public Notice (Report No. 1975), released October 1, 1993.

<sup>10</sup> BPP should not apply to foreign-issued calling card calls and operator-assisted calls billed to foreign numbers because it is technically impractical.

format. When a consumer uses an 891 or CIID calling card, he or she has, in effect, selected the carrier associated with that card to carry the call. Therefore, when a consumer dials 0+ and uses one of these cards, the LEC should route the call, based on the card number, to the carrier that issued the card.

The Commission also tentatively concludes that if BPP is implemented, it should accommodate commercial credit cards that conform to the standards set by the International Organization for Standardization and the American National Standards Institute. In addition, however, the commercial credit card companies should comply with the intent of BPP by insuring that the end user is allowed to select his or her 0+ carrier. The credit card associations should not be allowed to make the carrier selection for the customer. Furthermore, the commercial credit card companies should be required to use a standard telecommunications industry numbering format so that the LECs and the IXCs can identify the card issuer. They also should develop a LIDB-like database for validating the commercial calling card number and identifying the end user's preferred carrier, and the database should be accessible through industry standard interfaces. Adequate fraud controls also would have to be developed.

### Conclusion

BPP finally will provide the basis for equal access and for competition in the operator services market and thus will benefit

both consumers and competition. Accordingly, the Commission should find that BPP will serve the public interest and order its implementation in the public switched network no later than 18 months from the issuance of an order. Moreover, to ensure that BPP is deployed in an efficient and expeditious manner, the Commission should order a specific deployment schedule, including a prescribed start date, to enable all carriers to plan and execute the necessary network modifications. In addition, the Commission should establish an industry forum to deal with implementation issues as they arise, and the Commission should require the filing of LEC tariffs sufficiently in advance of the planned implementation date as to permit adequate review of such tariffs.

Thus, based on the foregoing, MCI respectfully requests that the Commission order the implementation of BPP as discussed herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 1st day of August 1994, copies of the foregoing "COMMENTS" in CC Docket No. 92-77 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.

  
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